

Eric L. Cramer (*Pro Hac Vice*)
Michael Dell'Angelo (*Pro Hac Vice*)
Patrick F. Madden (*Pro Hac Vice*)
Mark R. Suter (*Pro Hac Vice*)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 875-3000
Facsimile: (215) 875-4604
ecramer@bm.net
mdellangelo@bm.net
pmadden@bm.net
msuter@bm.net

*Co-Lead Counsel for the Classes and
Attorneys for Individual and Representative Plaintiffs
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier
Vazquez, Brandon Vera, and Kyle Kingsbury*

(Additional counsel appear on signature page)

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**STIPULATION REGARDING
BRIEFING IN ADVANCE OF
EVIDENTIARY HEARING ON
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION (ECF NO. 518)**

1 Pursuant to the Court's request at the hearing on December 14, 2018, Plaintiffs Cung Le,
2 Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury ("Plaintiffs")
3 and Defendant Zuffa, LLC ("Zuffa"), by and through their respective undersigned attorneys,
4 stipulate to the following regarding the evidentiary hearing on Plaintiffs' Motion for Class
5 Certification (ECF No. 518):

6 1. With respect to the briefing that this Court requested regarding the appropriate
7 standard for the Court to decide, in the context of the motion to certify the class, (a) whether or
8 not Plaintiffs' experts' modeling can serve as a sufficient basis to certify the class and (b) what
9 specific findings the Court would have to make for the class to be certified based upon this
10 modeling (*see* ECF No. 628), the Parties agree to the following:

- 11 • Plaintiffs and Zuffa shall each file their Opening Brief on January 9, 2019.
- 12 • Plaintiffs and Zuffa shall each file their Responsive Brief on January 23, 2019.

13 2. Plaintiffs and Zuffa are meeting and conferring regarding the manner of use and/or
14 treatment of information that has been designated "Confidential" or "Highly Confidential –
15 Attorneys' Eyes Only" under the Protective Order in this litigation (ECF No. 217) during the
16 evidentiary hearing relating to class certification and any subsequent hearing on summary
17 judgment. If Plaintiffs and Zuffa do not reach agreement, the Parties agree to prepare competing
18 proposals regarding the use of Confidential or Highly-Confidential-Attorneys' Eyes Only
19 materials according to the following schedule:

- 20 • Plaintiffs and Zuffa shall each file their respective proposals on January 9, 2019.
- 21 • Plaintiffs and Zuffa shall each file their respective response to the opposing party's
22 proposal on January 23, 2019.

23 3. Each of the briefs, proposals, and/or responses submitted pursuant to this
24 Stipulation shall not exceed ten pages, inclusive of any appendices containing newly written
25 materials.

Dated: December 20, 2018

Dated: December 20, 2018

BERGER MONTAGUE PC

BOIES SCHILLER FLEXNER LLP

By: /s/ Eric L. Cramer

By: Stacey K. Grigsby

Eric L. Cramer (admitted *pro hac vice*)
 Michael Dell'Angelo (admitted *pro hac vice*)
 Patrick F. Madden (admitted *pro hac vice*)
 Mark R. Suter (admitted *pro hac vice*)
 1818 Market Street
 Philadelphia, Pennsylvania 19103
 Phone: (215) 875-3000/Fax: (215) 875-4604
 ecramer@bm.net
 mdellangelo@bm.net
 pmadden@bm.net
 msuter@bm.net

William A. Isaacson (admitted *pro hac vice*)
 Stacey K. Grigsby (admitted *pro hac vice*)
 Nicholas A. Widnell (admitted *pro hac vice*)
 1401 New York Ave, NW
 Washington, D.C. 20005
 Phone: (202) 237-2727/Fax: (202) 237-6131
 wisaacson@bsflp.com
 sgrigsby@bsflp.com
 nwidnell@bsflp.com

*Attorneys for Defendant Zuffa, LLC, d/b/a
 Ultimate Fighting Championship and UFC*

*Co-Lead Counsel for the Classes and
 Attorneys for Individual and Representative
 Plaintiffs Cung Le, Nathan Quarry, Jon
 Fitch, Luis Javier Vazquez, Brandon Vera,
 and Kyle Kingsbury*

CAMPBELL & WILLIAMS

Donald J. Campbell (State Bar No. 1216)
 J. Colby Williams (State Bar No. 5549)
 700 South 7th Street
 Las Vegas, Nevada 89101
 Phone: (702) 382-5222/Fax: (702) 382-0540
 djc@campbellandwilliams.com
 jcw@campbellandwilliams.com

*Attorneys for Defendant Zuffa, LLC, d/b/a
 Ultimate Fighting Championship and UFC*

**COHEN MILSTEIN SELLERS
 & TOLL, PLLC**

BOIES SCHILLER FLEXNER LLP

Benjamin D. Brown (admitted *pro hac vice*)
 Richard A. Koffman (admitted *pro hac vice*)
 Daniel Silverman (admitted *pro hac vice*)
 1100 New York Ave., N.W.
 Suite 500, East Tower
 Washington, D.C. 20005
 Phone: (202) 408-4600/Fax: (202) 408 4699
 bbrown@cohenmilstein.com
 rkoffman@cohenmilstein.com
 dsilverman@cohenmilstein.com

Richard J. Pocker (State Bar No. 3568)
 300 South Fourth Street, Suite 800
 Las Vegas, Nevada 89101
 Phone: (702) 382-7300/Fax: (702) 382-2755
 rpocker@bsflp.com

*Attorneys for Defendant Zuffa, LLC, d/b/a
 Ultimate Fighting Championship and UFC*

*Co-Lead Counsel for the Classes and
 Attorneys for Individual and Representative
 Plaintiffs Cung Le, Nathan Quarry, Jon
 Fitch, Luis Javier Vazquez, Brandon Vera,
 and Kyle Kingsbury*

JOSEPH SAVERI LAW FIRM, INC.

Joseph R. Saveri (admitted *pro hac vice*)
Joshua P. Davis (admitted *pro hac vice*)
Kevin E. Rayhill (admitted *pro hac vice*)
Jiamin Chen (admitted *pro hac vice*)
601 California Street, Suite 1000
San Francisco, California 94108
Phone: (415) 500-6800/Fax: (415) 395-9940
jsaveri@saverilawfirm.com
jdavis@saverilawfirm.com
krayhill@saverilawfirm.com
jchen@saverilawfirm.com

*Co-Lead Counsel for the Classes and
Attorneys for Individual and Representative
Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,
Luis Javier Vazquez, Brandon Vera, and Kyle
Kingsbury*

**WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP**

Don Springmeyer
Nevada Bar No. 1021
Bradley S. Schrager
Nevada Bar No. 10217
3556 E. Russell Road, Second Floor
Las Vegas, Nevada 89120
(702) 341-5200/Fax: (702) 341-5300
dspringmeyer@wrslawyers.com
bschrager@wrslawyers.com

*Liaison Counsel for the Classes and Attorneys
for Individual and Representative Plaintiffs
Cung Le, Nathan Quarry, Jon Fitch, Luis
Javier Vazquez, Brandon Vera, and Kyle
Kingsbury*

**WARNER ANGLE HALLAM JACKSON
& FORMANEK PLC**

Robert C. Maysey (admitted *pro hac vice*)
Jerome K. Elwell (admitted *pro hac vice*)
2555 E. Camelback Road, Suite 800
Phoenix, Arizona 85016
Phone: (602) 264-7101/Fax: (602) 234-0419
rmaysey@warnerangle.com
jelwell@warnerangle.com

*Counsel for the Classes and Attorneys for
Individual and Representative Plaintiffs Cung
Le, Nathan Quarry, Jon Fitch, Luis Javier
Vazquez, Brandon Vera, and Kyle Kingsbury*

**LAW OFFICE OF FREDERICK S.
SCHWARTZ**

Frederick S. Schwartz (admitted *pro hac vice*)
15303 Ventura Boulevard, #1040
Sherman Oaks, California 91403
Phone: (818) 986-2407/Fax: (818) 995-4124
fred@fredschwartzlaw.com

*Counsel for the Classes and Attorneys for
Individual and Representative Plaintiffs Cung
Le, Nathan Quarry, Jon Fitch, Luis Javier
Vazquez, Brandon Vera, and Kyle Kingsbury*

**SPECTOR ROSEMAN KODROFF &
WILLIS, P.C.**

Jeffrey J. Corrigan (admitted *pro hac vice*)
William G. Caldes (admitted *pro hac vice*)
1818 Market Street, Suite 2500
Philadelphia, Pennsylvania 19103
Phone: (215) 496-0300/Fax: (215) 496-6611
jcorrigan@srkw-law.com
wcaldes@srkw-law.com

*Counsel for the Classes and Attorneys for
Individual and Representative Plaintiffs Cung
Le, Nathan Quarry, Jon Fitch, Luis Javier
Vazquez, Brandon Vera, and Kyle Kingsbury*

RADICE LAW FIRM, P.C.

John D. Radice (admitted *pro hac vice*)
34 Sunset Blvd
Long Beach, NJ 08008
jradice@radicelawfirm.com

*Counsel for the Classes and Attorneys for
Individual and Representative Plaintiffs Cung
Le, Nathan Quarry, Jon Fitch, Luis Javier
Vazquez, Brandon Vera, and Kyle Kingsbury*

ATTESTATION OF FILER

The signatories to this document are myself and Stacey Grigsby, and I have obtained Ms. Grigsby's concurrence to file this document on her behalf.

Dated: December 20, 2018

/s/ Eric L. Cramer

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December, 2018 a true and correct copy of the Parties' **Stipulation Regarding Briefing in Advance of Evidentiary Hearing on Plaintiffs' Motion for Class Certification (ECF No. 518)** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

/s/ Eric L. Cramer